

Lexi J. Hazam
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008
lhazam@lchb.com

Christopher A. Seeger
SEEGER WEISS, LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: 973.639.9100
Facsimile: 973.679.8656
cseeger@seegerweiss.com

Previn Warren
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202.386.9610
pwarren@motleyrice.com

Co-Lead Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**DECLARATION OF PREVIN WARREN IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION PURSUANT
TO CIVIL LOCAL RULE 7-11 TO
ADDRESS PLAINTIFFS' GENERAL
NEGLIGENCE CAUSE OF ACTION IN
DECIDING DEFENDANTS' PENDING
MOTIONS TO DISMISS PLAINTIFFS'
MASTER COMPLAINT**

1 I, Previn Warren, declare and state as follows:

2 1. I am an attorney at Motley Rice LLC and Co-Lead Counsel for Plaintiffs in this
3 action. I make this declaration based on my own personal knowledge. If called upon to testify, I
4 could and would testify competently to the truth of the matters stated herein.

5 2. I submit this declaration, as required by Civil Local Rule 7-11, regarding
6 Plaintiffs' Administrative Motion to Address Plaintiffs' General Negligence Cause of Action in
7 Deciding Defendants' Pending Motions to Dismiss Plaintiffs' Master Complaint.

8 3. Pursuant to Civil Local Rule 7-11(a), the Parties met and conferred regarding
9 Plaintiffs' request to address Plaintiffs' general negligence claim with Defendants' pending
10 motions to dismiss.

11 4. Defendants oppose Plaintiffs' request and have indicated they will file an
12 opposition pursuant to Civil Local Rule 7-11(b). The Parties, therefore, could not reach a
13 stipulation pursuant to Civil Local Rule 7-11(a).

14 I declare under penalty of perjury that the foregoing is true and correct. Executed on
15 October 16, 2023, in Washington, District of Columbia.

16 /s/ Previn Warren
17 Previn Warren
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